

TSD File Inventory Index

Date: July 15, 2008

Initial: CMK/enc

Facility Name: <u>Spartan Steel Coatings, LLC</u>			
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Note: Transmittal Letter to Be Included with Reports.
Comments: _____



3300 Wolverine Drive, Monroe, MI 48162
Phone: 734.289.5400 Fax: 734.289.5401



Certificate 33459



Certificate 36354

January 6, 2004

Mr. Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

RE: Notice of Violation Letter dated December 31, 2003
Spartan Steel Coating, EPA ID No.: MIR 000 033 282

Dear Mr. Little:

This letter is to acknowledge receipt of the Notice of Violation sent December 31, 2003, following our inspection on September 16, 2003, and to inform you that in response to Mr. Atkociunas's visit, Spartan prepared corrective actions to address each of the two nonconformances. Copies of these actions were submitted via e-mail to Mr. Atkociunas on October 23, 2003, and are attached for your reference.

I also wanted to inform you that on October 15, 2003, Spartan applied for and subsequently received from the Michigan Department of Environmental Quality a change in generator status. We are now classified as a small quantity generator.

We remain committed to the ongoing management and continual improvement of our Environmental Management System. Should you have any further questions regarding our recent inspection or subsequent handling of findings delineated in your letter, please feel free to contact me.

Sincerely,

SPARTAN STEEL COATING

A handwritten signature in blue ink that reads "Karen M. Reaume".

Karen M. Reaume
Management Systems Coordinator
(734) 289-5445

Attachments: Copies of CARs EPA Audit #1 and EPA Audit #2
Copy of EPQ5150-V changing status to small quantity generator

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Karen Reaume
QS/ISO Coordinator
Spartan Steel Coating, L.L.C.
3300 Wolverine Drive
Monroe, Michigan 48162

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) WALTER A YEAGER JR B. Date of Delivery Jan-8-01

C. Signature [Signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number
(Transfer from s

del)

7001 0320 0006 0295 1693

PS Form 3811, March 2001

Domestic Return Receipt

102595-01-M-1424



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

DEC 31 2003

REPLY TO THE ATTENTION OF:
DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Karen Reaume
QS/ISO Coordinator
Spartan Steel Coating, L.L.C.
3300 Wolverine Drive
Monroe, Michigan 48162

Re: Notice of Violation
Spartan Steel Coating, L.L.C.
EPA Id No.: MIR 000 033 282

Dear Ms. Reaume:

On September 16, 2003, a representative of United States Environmental Protection Agency (U.S. EPA) inspected Spartan Steel Coating, L.L.C. (Spartan Steel) located in Monroe, Michigan. The purpose of the inspection was to evaluate Spartan Steel's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection checklist is enclosed for your reference.

Based on information provided by Spartan Steel personnel, review of records, and physical observations made by the inspector at the time of the investigation, the U.S. EPA has determined that Spartan Steel was engaged in the management of hazardous waste without a hazardous waste storage permit and was in violation of the requirements of the Michigan Administrative Code and the United States Code of Federal Regulation (CFR). To be eligible for the exemption from having a hazardous waste storage license, Spartan Steel must be in compliance with the conditions of Michigan Administrative Code (MAC) R 299.9306 [40 CFR Part 262.34]. Spartan Steel was found to have been in noncompliance with the following condition for an exemption from the license requirement, and in violation of the following requirement:

1. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must always keep satellite accumulation containers holding hazardous waste closed except when it is necessary to add or remove waste. See Michigan Administrative Code R 299.9306(2), 40 CFR § 265.173(a) [40 CFR § 262.34(c)(1)(i)]. Maintaining containers closed is also a requirement of owners and operators of hazardous waste storage facilities, under R299.9601(2)(g), R299.9614(1)(a), and 40 CFR § 264.173(a). Spartan Steel failed to ensure that a satellite container of hazardous waste adjacent to the

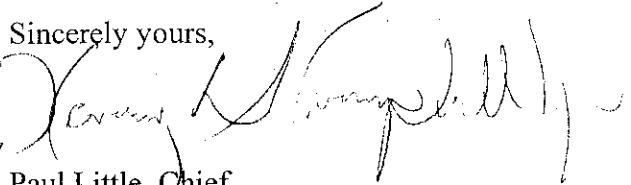
Roll Coater was stored closed. The container was labeled as hazardous waste and "Chromic Absorbents" with EPA waste codes D002 and D007 assigned. Waste was not being added or removed from the drum when the open container was witnessed. Spartan Steel therefore failed to comply with the above-mentioned condition for a license exemption, and violated the storage facility container closure requirement. Facility representatives corrected the condition at the time of the inspection. No further documentation is required.

2. A large quantity generator who accumulates hazardous waste on-site for 90 days or less, and who does not meet the conditions for a license exemption of MAC R.299.9306 [40 CFR § 262.34], is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage license. See, MAC R.299.9502(1), 299.9508, and 299.9510 [40 CFR §§ 270.1, 270.10, 270.13.]. On failing to keep a satellite container closed as specified above, Spartan Steel's failure to apply for and obtain a hazardous waste storage license violated the licensing requirements of MAC R.299.9502(1), 299.9508, and 299.9510.

At this time, U.S. EPA is not requiring Spartan Steel to apply for a storage license, so long as it continues to remain back in compliance with all of the conditions for a license exemption of MAC R.299.9306(1)-(2). Please note that this determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. U.S. EPA and MDEQ will continue to evaluate your facility in the future.

If you have any questions regarding this letter, please contact Paul Atkociunas of my staff at (312) 886-7502.

Sincerely yours,


FOR Paul Little, Chief
Compliance Section # 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Lee Carter, MDEQ, Jackson District Office

U.S. EPA REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: Spartan Steel Coating, L.L.C.

FACILITY U.S. EPA ID NO.: MIR 000 033 282

FACILITY TYPE: Zinc galvanizer

FACILITY ADDRESS: 3300 Wolverine Drive
Monroe, Michigan 48162

FACILITY REPRESENTATIVE: Karen Reaume
QS/ISO Coordinator
Spartan Steel Coating, L.L.C.
3300 Wolverine Drive
Monroe, Michigan 48162
734-289-5445

David E. Brandau
Operations Manager
Spartan Steel Coating
3300 Wolverine Drive
Monroe, Michigan 48162
734-289-5405

U.S. EPA REPRESENTATIVE: Paul Atkociunas
WPTD, ECAB, Compliance Section 2
77 West Jackson Blvd (DE-9J)
Chicago, Illinois 60604
(312) 886-7502
(312) 353-4342 Facsimile
Atkociunas.Paul@epa.gov

DATE(S) OF INSPECTION: September 16, 2003

NAIC (SIC) CODE(s): 3479

INTRODUCTION:

The facility zinc galvanizes cold rolled steel. Waste streams generated at the facility include, but are not limited to chromic acid, absorbents contaminated with chromic acid, an ammonium dichromate/ammonium hydroxide solution, spent caustic and waste oils/coolant. At the time of the inspection, the facility was a large quantity generator of hazardous waste.

INSPECTION:

On September 16, 2003, U.S. EPA inspector Paul Atkociunas arrived at the facility and met with Karen Reaume, QS/ISO Coordinator and David E. Brandau, Operations Manager. The inspector presented his federal enforcement credentials and explained the nature, scope, and purpose of the inspection. The inspection was a Compliance Evaluation Inspection to determine the facility's compliance status under the Resource Conservation and Recovery Act and Part 111 of the Michigan Natural Resources and Environmental Protection Act. Facility representatives described the processes at the facility and requested the U.S. EPA inspector to watch a health/safety video of the facility. After watching the video, Ms. Reaume and Mr. Brandau allowed the inspector access to the facility to conduct the inspection. A walk through of the facility was conducted with Ms. Reaume, Mr. Brandau and U.S. EPA inspector Paul Atkociunas.

WALK THROUGH

Quality Assurance Laboratory

The Quality Assurance laboratory accumulated two waste streams - chromic acid and ammonium dichromate/ammonium hydroxide solution. Chromic acid solution was accumulated in a 55-gallon drum. The ammonium dichromate/ammonium hydroxide solution was accumulated in 5 gallon containers. The 55-gallon drum of chromic acid was identified with a hazardous waste label and D002 and D007 waste codes on the label. The 5-gallon containers were labeled as Ammonium Dichromate Ammonium hydroxide stripping solution and Phosphate Stripping Solution - Chromic Hazardous Waste.

The facility maintained two satellite containers along the Roll Coater. One 55-gallon open top drum was not closed at the time of initial arrival at the container. The drum was labeled as Chromic absorbents (D002, D007). Waste was not being added to or removed from the drum at the time of the inspection. Facility representatives closed the container during the inspection. The other container was a 55-gallon closed top drum that was labeled Hazardous Waste, Chromic acid with hazardous waste codes D002 and D007 identified.

Hazardous Waste Accumulation area

The Hazardous Waste accumulation area was inside the facility located adjacent to the Wastewater treatment area. The storage area was protected by a secondary containment area with coated concrete. At the time of the inspection, there was one 55-gallon closed top drum in the hazardous waste accumulation area. The drum was labeled as Hazardous Waste, Chromate absorbents and EPA

waste codes D002, D007 were assigned. The drum was marked with an accumulation start date of 8/08/03.

Used Oil

Two 350-gallon totes that contained used oil/coolants were located in a coated secondary containment unit in the northeast corner of the production area. The totes were labeled as "Waste Oil."

Paperwork Review

The U.S. EPA inspector reviewed the facility's manifests, land disposal restrictions, inspection logs, biennial reports, emergency contingency plan, waste characterizations and training records. No deficiencies were noted.

ATTACHMENTS:

cc: Lee Carter, MDEQ, Jackson District Office



Department of Environmental Quality, Waste and Hazardous Materials Division
GENERATOR INSPECTION FORM

Facility's Name SPARTAN STEEL COATING Part 3 Rules
Date 9/14/03 ID# MIR 000 033 282 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Chromic Acid	ROLL COATER ILAB	Several dr/mo.
Chromic Absorbents	ROLL COATER	Several dr/mo.
OXID LIQ / Corrosive LIQ (NH ₄ OH)	LAB	~ 1 dr/mo.

____ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS
NI - Not Inspected N/A - Not Applicable

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

		YES	NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11))	GGR	<input checked="" type="checkbox"/>	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	GRR	<input checked="" type="checkbox"/>	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	GGR	<input checked="" type="checkbox"/>	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d): 40 CFR 268.7(a)(5))	GPT	<input type="checkbox"/>	NI <input checked="" type="checkbox"/> N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	GGR	<input checked="" type="checkbox"/>	NI N/A
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MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	GMR	<input checked="" type="checkbox"/>	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))	GRR	<input checked="" type="checkbox"/>	NI N/A
6. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?	GMR	<input checked="" type="checkbox"/>	NI N/A
a) manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
b) generator's name, address, phone & ID # (Rule 304(2)(b): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
c) name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
d) name, address & ID # of TSDF. (Rule 304(2)(d): 40 CFR 262.20(b)&(c))	GMR	<input checked="" type="checkbox"/>	NI N/A
e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
g) hazardous waste number of the wastes. (Rule 304(2)(g): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
h) generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b): 40 CFR 262.23(a)(1)&(2))	GMR	<input checked="" type="checkbox"/>	NI N/A
7. Submitted copy of manifests to Director no later than 10 days after month shipment was made? (Rule 304(4)(d))	GMR	<input checked="" type="checkbox"/>	NI N/A
8. For out-of-state manifests, was copy of 3 rd signature manifest submitted to Director? (Rule 304(4)(f))	GMR	<input checked="" type="checkbox"/>	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Section (2)&(3)? (Rule 304(1)(c))	GPT	<input checked="" type="checkbox"/>	NI N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).

10. Using manifest that has expired? (Rule 304(2)(i): 40 CFR 262.20(a))	GMR	<input type="checkbox"/>	NI N/A
11. Reportable exceptions. (Rule 308(3): 40 CFR 262.42))			
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:	GRR		
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:	GRR		
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(2)(i): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A

OR

13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(2)(i): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
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LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

YES NO

14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))		
a) all listed waste	GLB	<input checked="" type="checkbox"/> NI N/A
b) all characteristic wastes?	GLB	<input checked="" type="checkbox"/> NI N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	GLB	<input checked="" type="checkbox"/> NI N/A
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OR

16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	GLB	<input type="checkbox"/> NI N/A
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OR

17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	GLB	<input type="checkbox"/> NI N/A
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OR

18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	GLB	<input type="checkbox"/> NI N/A
19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)		
a) EPA hazardous waste #?	GLB	<input checked="" type="checkbox"/> NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	GLB	<input checked="" type="checkbox"/> NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	GLB	<input checked="" type="checkbox"/> NI N/A
d) manifest number associated with the shipment?	GLB	<input checked="" type="checkbox"/> NI N/A
e) waste analysis data, where available?	GLB	<input checked="" type="checkbox"/> NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	GLB	<input checked="" type="checkbox"/> NI N/A

UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	GLB	<input type="checkbox"/> NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (Rule 311(1): 40 CFR 268 Subpart D & 268.48)	GLB	<input checked="" type="checkbox"/> NI N/A
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)		
a) if the notice is for shipments that meet the standards does the notice include the certification?	GLB	<input type="checkbox"/> NI N/A
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	GLB	<input type="checkbox"/> NI N/A

NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6)	GLB	<input checked="" type="checkbox"/> NI N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	GLB	<input checked="" type="checkbox"/> NI N/A
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8).	GLB	<input checked="" type="checkbox"/> NI N/A

NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	GLB	<input checked="" type="checkbox"/> NI N/A
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TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	GLB	<input type="checkbox"/> NI N/A
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BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

YES NO

Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	GRR	<i>Sec last/pt</i>	<input type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
7. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	GRR		<input type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30)	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
29. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
30. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document # & waste code; 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
31. If required (>1000 #s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	GPT	<input type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35)				
a) containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1))	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A

UNLESS

e) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	GPT	<input type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
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The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
g) are containers compatible with waste in them (265.172)	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
h) are containers stored closed? (265.173(a))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line? (265.176)	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
k) are containers inspected weekly for leaks and defects? (265.174)	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(i) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:				
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
e) are container(s) in good condition? (265.171)	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
f) are container(s) compatible with waste in them? (265.172)	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:				
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A
b) move to an area with secondary containment?	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include				
a) impervious base free of cracks? (264.175(b)(1)):	GPT	<input checked="" type="checkbox"/>	NI	<input checked="" type="checkbox"/> N/A

		YES	NO
b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	GPT	<input type="checkbox"/>	NI <input checked="" type="checkbox"/> N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	GPT	<input type="checkbox"/>	NI <input checked="" type="checkbox"/> N/A

inside

NOTE: Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020, F021, F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	GPT	<input type="checkbox"/>	NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? <i>Explain any yes answer.</i>			NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	GPT	<input checked="" type="checkbox"/>	NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	GPT	<input checked="" type="checkbox"/>	NI N/A
40. Is hazardous waste accumulated in tanks? <i>If so, complete Tank System inspection form.</i>		<input checked="" type="checkbox"/>	NI N/A
41. Is hazardous waste placed on drip pads? <i>If so, complete Wood Preserving inspection form</i>			NI <input checked="" type="checkbox"/> N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16

PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	GPT	<input checked="" type="checkbox"/>	NI N/A
43. Do personnel training records contain the following:			
a) job title? (265.16(d)(1))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) job descriptions? (265.16(d)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) name of employee filling each job? (265.16(d)(1))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
f) records of training? (265.16(d)(4))	GPT	<input checked="" type="checkbox"/>	NI N/A
g) do new personnel receive required training within 6 months? (265.16(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	GPT	<input checked="" type="checkbox"/>	NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	GPT	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.

PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	GPT	co.said_obsrvd. <input checked="" type="checkbox"/>	NI N/A
45. If required, does this facility have the following::			
a) internal communications or alarm systems? (265.32(a))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	GPT	<input checked="" type="checkbox"/>	NI N/A
46. Testing and Maintenance of Emergency Equipment			
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	GPT	<input checked="" type="checkbox"/>	NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable only if required (40 CFR 265.32)			
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	GPT	<input checked="" type="checkbox"/>	NI N/A
ii) one employee on the premises while facility is operating. (265.34(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	GPT	<input checked="" type="checkbox"/>	NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	GPT	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

		YES	NO
48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
49. Does the contingency plan contain the following:			
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	GPT	<input checked="" type="checkbox"/>	NI N/A
c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	GPT	<input checked="" type="checkbox"/>	NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	GPT	<input checked="" type="checkbox"/>	NI N/A
50. Does the facility have an Emergency Coordinator? (265.55)	GPT	<input checked="" type="checkbox"/>	NI N/A
Emergency Coordinator and Emergency Procedures:			
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	GPT	<input checked="" type="checkbox"/>	NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	GPT	<input checked="" type="checkbox"/>	NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
51. Contingency plan Amendments and Copies			
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
b) copies of plan on site and sent to local emergency organizations? (265.53)	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55
INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?	GEX	<input checked="" type="checkbox"/>	NI N/A
a) exporting, has the generator:			
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	GEX	<input type="checkbox"/>	NI N/A
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	GEX	<input type="checkbox"/>	NI N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	GEX	<input type="checkbox"/>	NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-i).	GEX	<input type="checkbox"/>	NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	GEX	<input type="checkbox"/>	NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	GIX	<input type="checkbox"/>	NI N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114
ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:			
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or haz. waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A

COMMENTS:

7



Waste, Pesticides and Toxics Division

Type of Document: ☒ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action

Facility Name : Spartan Steel Coating LLC

Facility Location: 3300 Wolverine Drive

City: Monroe State: MI

U.S. EPA ID# MIR 000 033 282

Assigned Staff Paul Atkociunas Phone: 6-7502

Name	Signature	Date
Author	<i>Paul Atkociunas</i>	12/29/03
Regional Counsel	<i>Michael McElroy</i>	12/30/03
Section Chief	<i>NG for Paul Little</i>	12/31/03
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

7061 0320 0006 0295 1693

From: Karen Reaume
To: atkociunas.paul@epa.gov
Date: 10/23/03 1:48:23 PM
Subject: Follow-up to your visit on 9/17/03

Paul,

In follow-up to your recent visit here to Spartan Steel Coating, we've completed the two attached corrective actions. I believe you will find these satisfactorily address the issues you pointed out; however, should you have any further questions or concerns, please feel free to contact me.

Karen Reaume
Management Systems Representative
Spartan Steel Coating
(734) 289-5445

CC: Brandau, Dave; Salliotte, Dave; Veth, Elaine

Corrective Action Request and Response

Audit No.: EPA Audit	Element No.	Item No.: 1	Audit Date: 9/17/03
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Auditor: Paul Atkociunas Auditee: Brandua/Reaume/Salliotte Activity Audited: Environmental Management & Hazardous Waste Management

CAR Description:

When auditing the Satellite Accumulation Area next to the roll coater, the auditor found the lid on the hazardous waste rag drum. Per regulation, the lid must be sealed on the drum at all times unless waste is being added to the drum.

Issued To: Dave Salliotte	Issue Date: 9/17/03
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Result of investigation into possible causes(s):

The last operator to clean the coater did not close and seal the lid.

Root Cause(s):

Lack of attention to detail, not using the training received during HAZWOPER.

Corrective Action Plan:

Initial step - The drum lid was immediately secured and an e-mail sent to all operators outlining the incident and the proper action.

Follow-up - During annual training on Oct 9 and Oct 15, 2003, Dave Salliotte presented a short slideshow with pictures depicting the proper and improper ways to keep drums closed and a brief reminder of the regulations was reviewed.

Approved by:	To be completed by: 10/17/03
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Don't forget to update:

Date Checked: 10/17/03 **Checked By:** D. Salliotte

FMEA ☐ Control Plan ☐ Create/Change Procedure ☐ Create/Change Form ☒ Create/Change Inspection ☐ PM ☐ Design

Evidence of Effectiveness/ Verification of Corrective Action Plan:

10/17/03 - Training was completed with all production personnel. Weekly hazardous waste inspections have not indicated any further issues.

Corrective Action Request and Response

Audit No.: EPA Audit	Element No.	Item No.: 2	Audit Date: 9/17/03
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Auditor: Paul Atkociunas Auditee: Brandau/Reaume/Salliotte Activity Audited: Environmental Management & Hazardous Waste Management

CAR Description:

When auditing the Satellite Accumulation Area in the lab, the auditor examined the 5-gal drum of waste and the 55-gal drum of waste in the accumulation area. Upon reviewing waste codes and waste stream profiles, he requested that we further segregate the containers because of the incompatibility of the waste streams.

Issued To: Dave Salliotte	Issue Date: 9/17/03
----------------------------------	----------------------------

Result of investigation into possible causes(s):

Since the waste was in different containers, we thought we were okay.

Root Cause(s):

We didn't know enough about the chemical properties.

Corrective Action Plan:

Initial step - The 5-gallon container was immediately relocated to the area under the sample table just outside the lab door.

Long Term - A caged containment was permanently made under the table outside the lab door and operators were informed of the new storage location during training on Oct 9 and 15, 2003.

Approved by:	To be completed by: 10/17/03
---------------------	-------------------------------------

Don't forget to update: **Date Checked:** 10/17/03 **Checked By:** D. Salliotte

Evidence of Effectiveness/ Verification of Corrective Action Plan:

10/17/03 - containment complete and training provided





JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

HAZARDOUS WASTE AND/OR LIQUID INDUSTRIAL WASTE SITE

This letter confirms that the Michigan Department of Environmental Quality (MDEQ) received the information you submitted to update the data maintained under the site identification number issued under Part 111, Hazardous Waste Management, Section 324.11101 *et seq.* or Part 121, Liquid Industrial Waste, Section 324.12101 *et seq.* of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA).

Enclosed is a copy of the pre-populated site verification form EQP5150-v with the site's identification number listed (see I. Site's ID Number, A. Identification Number).

Please verify the existing data and submit any corrections to the MDEQ at the address indicated on the form.

You can also use this form at a later date to update information due, for example, to a change in the facility name or in the owner(s) or operator(s) of the facility.

In contrast, a **new** site identification form must be submitted if the business moves to another location (since the ID number is assigned to the physical location).

You can obtain a copy of Part 111, Hazardous Waste Management, and administrative rules or Part 121, Liquid Industrial Waste, by downloading it from the "waste" page (look for the "Hazardous Waste" link at the MDEQ web page at <http://www.michigan.gov/deq>). You can obtain a paper copy of Part 111 (for postage for 1 ounce), Part 121 (for postage for 1 ounce), or the Part 111 rules (for \$12.45, plus postage for 3 pounds) by sending a self-addressed 12" by 15" envelope with postage affixed and a check payable to the "State of Michigan" for the correct amount to:

WASTE AND HAZARDOUS MATERIALS DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
HAZARDOUS WASTE AND RADIOLOGICAL PROTECTION SECTION
PO BOX 30241
LANSING MI 48909-7741

If you have any questions concerning the enclosed data or the site identification form please contact a Site Identification Program Coordinator at 517-335-2690.

MAIL THE COMPLETED FORM TO:

Waste Management Division
 Mich. Dept. of Environmental Quality
 Notification Unit
 PO BOX 30241
 Lansing MI 48909-7741

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

WASTE MANAGEMENT DIVISION

SITE IDENTIFICATION VERIFICATION

Required under authority of the Natural Resources and Environmental Protection Act, 1994
 PA 451, as amended. Failure to submit this information may result in civil or criminal penalties.



I. Site's ID Number

A. Identification (ID) Number: MIR000033282

II. Name of Site

A. Legal company name: SPARTAN STEEL COATING

B. Site Specific Name (d/b/a): SPARTAN STEEL COATING

III. Correct the Name of Site or add missing information. (TYPE OR PRINT CLEARLY)

A. Legal company name:

B. Site Specific Name (d/b/a):

IV. NAICS Code(s) for the Site

332812 - Metal Coating

IV. Correct the NAICS Code(s) for the Site or add new codes. (TYPE OR PRINT CLEARLY)

A.

B.

C.

D.

V. Site Location Information

Street Address: SPARTAN STEEL COATING LLC, 3300 WOLVERINE DRIVE

City, Town or Village: MONROE

State: MI

Province or Subdivision:

Country: U.S.A.

County Name (MI only): MONROE

Zip Code or Postal Code: 48162

Site Tax Identification Number: 38XXXXXX52

Number of Employees: 76

V. Correct the Site Location Information or add missing information. (TYPE OR PRINT CLEARLY)

Street Address:

City, Town or Village:

State:

Province or Subdivision:

Country:

County Name (MI only):

Zip Code or Postal Code:

Site Tax Identification Number:

Number of Employees:

VI. Site Mailing Information

Street or P.O. Box: SPARTAN STEEL COATING LLC, 3300 WOLVERINE DRIVE

City, Town or Village: MONROE

State: MI

Province or Subdivision:

Country: U.S.A.

Zip Code or Postal Code: 48162

VI. Correct the Site Mailing Address or add missing information. (TYPE OR PRINT CLEARLY)

Street or P.O. Box:

City, Town or Village:

State:

Province or Subdivision:

Country:

Zip Code or Postal Code:

VII. Site Contact Person

First Name: ELAINE

MI:

Last Name: VETH

Phone Number: (734) 289-5400

Phone number extension:

VII. Correct the Site Contact Person. (TYPE OR PRINT CLEARLY)

First Name:

MI:

Last Name:

Phone Number:

Phone number extension:

VIII. Indian Reservation

Facility on Indian Reservation Land

☐ yes ☒ no**VIII. Correct the Indian Reservation Status**

Facility on Indian Reservation Land

☐ yes ☒ no**IX. Owner and/or Operator of Site**

Cross out any person who is no longer an owner and/or operator and write in the date this occurred.

- | | | | | |
|-------|----------------------|---|---|----------|
| 1 | Name of Site's Legal | <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Operator | Date became owner and/or operator (mm/dd/yyyy): | 8/1/1999 |
| | Name: | WORTHINGTON INDUSTRIES (PROP OWNER) | | |
| | Type (check one): | <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | | |
| <hr/> | | | | |
| 2 | Name of Site's Legal | <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Operator | Date became owner and/or operator (mm/dd/yyyy): | 8/1/1999 |
| | Name: | ROUGE STEEL (JOINT VENTURE) | | |
| | Type (check one): | <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | | |
| <hr/> | | | | |
| 3 | Name of Site's Legal | <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Operator | Date became owner and/or operator (mm/dd/yyyy): | 8/1/1999 |
| | Name: | WORTHINGTON INDUSTRIES (JOINT VENTURE) | | |
| | Type (check one): | <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | | |
| <hr/> | | | | |
| 4 | Name of Site's Legal | <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Operator | Date became owner and/or operator (mm/dd/yyyy): | 8/1/1999 |
| | Name: | SPARTAN STEEL COATINGS LLC | | |
| | Type (check one): | <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | | |

IX. Correct the Owner and/or Operator of Site information or add any new Operator and/or Owner information. (TYPE OR PRINT CLEARLY)

Name of Site's Legal	<input type="checkbox"/> Owner <input type="checkbox"/> Operator	Date became owner and/or operator (mm/dd/yyyy):
Name:		
Type (check one):	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	

Name of Site's Legal	<input type="checkbox"/> Owner <input type="checkbox"/> Operator	Date became owner and/or operator (mm/dd/yyyy):
Name:		
Type (check one):	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	

X. Type of Regulated Waste Activity

Currently, the Type of Regulated Waste activity information the DEQ has on your facility is the following...

A. Hazardous Waste Activity(ies): SQG-Small Qty Generator

B. Used Oil Activity(ies):

C. Universal Waste Activity(ies):

D. Liquid Industrial Waste Activity(ies):

E. Generation of waste ceased or Site closed:

X. Please check the appropriate box(es) for the type of regulated waste activity at this Site.**A. Hazardous Waste Activity(ies) at this location**

1. Generator of hazardous waste (choose only one of the following three categories)

- ☐ a. LQG (Large Quantity Generator): Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste
- ☐ b. SQG (Small Quantity Generator): 100 to 1,000 kg/mo (220 - 2,200 lbs.) of non-acute hazardous waste
- ☐ c. CESQG (Conditionally Exempt Small Quantity Generator): Less than 100 kg/mo of non-acute hazardous waste

For items 2 through 8, check all that apply

2. Transporter of hazardous waste

- ☐ a. Transport hazardous waste
- ☐ b. Commingle waste
- ☐ c. Offloads during transportation

3. Designated facility (hazardous waste received from off-site)

- ☐ a. Treats waste on-site
- ☐ b. Stores waste on-site
- ☐ c. Disposes of waste on-site
- ☐ d. Recycles recyclable materials on-site
- ☐ 4. Underground injects waste on-site
- ☐ 5. Import agent for hazardous waste
- ☐ 6. Generate mixed radioactive waste
- ☐ 7. Accepts waste from CESQG - accumulates over 1000 kg
8. Exempt boiler and/or Industrial Furnace
- ☐ a. Smelting, melting, and refining furnace exemption
- ☐ b. Small quantity on-site burner exemption

B. Used Oil Activity(ies) at this location, check all that apply:

1. Used Oil Fuel Marketer

- ☐ a. Marketer who directs shipments of off-specification used oil to used oil burner
- ☐ b. Marketer who first claims the used oil meets the specifications

2. Off-specification Used Oil Burner

3. Used Oil Transporter (check one only)

- ☐ a. Transporter Only
- ☐ b. Transporter with transfer facility

4. Used Oil Processor

5. Used Oil Re-refiner

6. Used Oil Collection or Aggregation Point

7. Collection Center or Aggregation Point that accepts DIY Used Oil

C. Universal Waste Activity(ies) at this location, check all that apply:

1. Large Quantity Handler

Type of universal waste	generating over 5,000 kg	accumulating
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
c. Mercury Thermometers	<input type="checkbox"/>	<input type="checkbox"/>
d. Devices containing elemental mercury	<input type="checkbox"/>	<input type="checkbox"/>
e. Mercury Switches	<input type="checkbox"/>	<input type="checkbox"/>
f. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
g. Electric Lamps	<input type="checkbox"/>	<input type="checkbox"/>

☐ 2. Designation Facility of Universal Waste (a hazardous waste permit may be required for this activity)

D. Liquid Industrial Waste Activities at this location, check all that apply:		E. Generation of waste ceased or Site closed at this location, check one:	
<input type="checkbox"/> 1. Liquid Industrial Waste Transporter		<input type="checkbox"/> 1. No longer generating waste, still in business	
<input type="checkbox"/> 2. Liquid Industrial Waste Generator		<input type="checkbox"/> 2. No longer generating waste, out of business	
<input type="checkbox"/> 3. Liquid Industrial Waste Designated Facility		Date	

XI. Certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature of owner, operator, or authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)